

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF WEST VIRGINIA**

QUIONTE CRAWFORD,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

Criminal No. 5:19CR35

Civil No. 1:21-CV-114

JUDGE KLEEH

**UNITED STATES'
MOTION FOR SECOND
EXTENSION OF TIME**

Now comes the United States of America by William Ihlenfeld, United States Attorney for the Northern District of West Virginia, and David J. Perri, Assistant United States Attorney, and respectfully requests a second extension of the amount of time allotted to respond to the Petitioner's "Supplement to Mr. Crawford's Pro Se Petition to Vacate, Set Aside, or Correct a Sentence by a Person in Federal Custody Pursuant to 28 U.S.C. § 2255." [Document No. 52]

MEMORANDUM

- 1) On May 12, 2022, the Petitioner's Counsel filed a twenty-one page Supplement to the defendant's original pro se § 2255 motion. [Document No. 52]
- 2) The Court ordered that the United States' response be filed on or before June 10, 2022. [Document No. 51]
- 3) On June 9, 2022, the United States filed a Motion for Extension of Time seeking an additional 30 days in which to respond. [Document No. 53] The Court granted that motion, ordering that the Response be filed by July 11th. [Document No. 54]

- 4) An 8-day family vacation, immediately followed by two nearly successive 5-day quarantines, the 4th of July holiday, and work on another pleading due on the 13th have made it difficult to devote time to the completion of a response.
- 5) Under the circumstances, the United States requests another extension to July 25th of the time in which to complete its Response.
- 6) The Undersigned Counsel has consulted with Petitioner's Counsel, Richard Walker, and he has no objection to the extension.

WHEREFORE, the United States respectfully requests an extension until July 25, 2022.

Respectfully submitted,

WILLIAM IHLENFELD
UNITED STATES ATTORNEY

By: /s/ David J. Perri
David J. Perri
Assistant United States Attorney/Bar Number: 9219
United States Attorney's Office
1125 Chapline Street, Suite 3000
Wheeling, West Virginia 26003
Telephone: (304) 234-0100
E-mail: David.Perri@usdoj.gov

CERTIFICATE OF SERVICE

I, David J. Perri, Assistant United States Attorney for the Northern District of West Virginia, hereby certify that the foregoing UNITED STATES MOTION FOR SECOND EXTENSION OF TIME electronically filed with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to the following:

Richard Walker, Esq.
2330 West Pike St., Ste.360
Clarksburg, WV 26302

Dated: July 8, 2022.

By: /s/ David J. Perri
David J. Perri
Assistant United States Attorney/Bar Number: 9219
United States Attorney's Office
1125 Chapline Street, Suite 3000
Wheeling, West Virginia 26003
Telephone: (304) 234-0100
Fax: (304) 234-0111
E-mail: David.Perri@usdoj.gov